	Case 2:18-cv-01850-JLR Document 19	Filed 06/13/19 Page 1 of 4
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		T. 1. Tana at Daham
4		Judge James L. Robart
5	UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON	
	AT SEATTLE	
6	JOHNNY B. DELASHAW, JR., M.D.	
7	Plaintiff,	Civil Action No. 2:18-cv-01850-JLR
8	VS.	STIPULATED MOTION &
0	VS.	ORDER COMPELLING PRODUCTION OF RECORDS
9		,
10	ALDEN ROBERTS, M.D.; MELANIE DELEON; MICAH MATTHEWS; GORDON	Note on Motion Calendar: June 13, 2019
	WRIGHT; AND STEPHEN CORREA, D.V.M.,	
11	Defendants.	
12	STIPULATION	
12	Plaintiff Johnny B. Delashaw and Defendants Alden Roberts, Melanie DeLeon, Micah	
13	Matthews, Gordon Wright, and Stephen Correa, by and through their respective counsel,	
14	stipulate as follows:	
15	1. Plaintiff seeks to compel full and complete responses to its First Requests for	
	Production of Documents, which were served on March 4, 2019, and for which Defendants	
16	provided partial responses on April 26, 2019, May 15, 2019, and May 17, 2019, and are	
17		
	currently reviewing approximately 8,800 electronic files for responsiveness, redaction, and	
18	privilege.	
19	2. To resolve this issue, the parties agree that the Court should enter an Order as	
	follows:	
20	STIPULATED MOTION & ORDER COMPELLING PRODUCTION OF RECORDS - Page 1 02975-001\2578547_3	LAW OFFICES BENNETT BIGELOW & LEEDOM, P.S. 601 Union Street, Suite 1500 Seattle, Washington 98101-1363 T: (206) 622-5511 F: (206) 622-8986

1	(a) Defendants shall provide full and complete responses to Plaintiff's First Request	
2	for Production, subject to the provisions of Fed. R. Civ. P. 26(e), not later than July	
	15, 2019;	
3		
4	(b) Responsive materials will be organized or identified by request for production	
4	numbers;	
5	(c) Where practicable, electronically stored information will be produced in native	
	format; and	
6		
	(d) Where practicable, responsive documents that have been identified and reviewed	
7	for privilege will be produced on a rolling basis prior to July 15, 2019.	
8	<b>DATED</b> this 13th day of June, 2019.	
9	BENNETT BIGELOW & LEEDOM, P.S.	
10	By s/ Amy M. Magnano	
10	Michael Madden, WSBA No. 8/4/	
Amy M. Magnano, WSBA No. 38484 Michael Maddera, WSBA No. 48169		
	Michael Maddera, WSBA No. 48169 Bennett Bigelow & Leedom, P.S.	
12		
	Seattle, Washington 98101-1363	
13	Telephone: (206) 622-5511	
	Fax: (206) 622-8986 Email: amagnano@bbllaw.com	
14	Attorneys for Plaintiff	
15	OFFICE OF THE ATTORNEY GENERAL	
16	By: s/ Scott Barbara	
	Scott Barbara, WSBA No. 20885	
17	Office of the Attorney General - Torts Division 800 5th Avenue, Suite 2000	
	Seattle, WA 98104	
18	(206) 464-7352	
Scottb2@atg.wa.gov		
19	Attorneys for Defendants	
20	STIPULATED MOTION & ORDER COMPELLING PRODUCTION OF RECORDS - Page 2  02975-001\2578547_3  LAW OFFICES BENNETT BIGELOW & LEEDOM, P.S. 601 Union Street, Suite 1500 Seattle, Washington 98101-1363	
	T: (206) 622-5511 F: (206) 622-8986	

1 **ORDER** IT IS SO ORDERED. DATED this it day of June, 2019. 3 United States District Judge 6 Presented by: 7 BENNETT BIGELOW & LEEDOM, P.S. 8 By s/ Amy M. Magnano Amy M. Magnano, WSBA No. 38484 9 Bennett Bigelow & Leedom, P.S. 601 Union Street, Suite 1500 10 Seattle, Washington 98101-1363 Telephone: (206) 622-5511 Fax: (206) 622-8986 11 Email: amagnano@bbllaw.com Attorneys for Plaintiff 12 13 14 15 16 17 18 19 20 STIPULATED MOTION & ORDER COMPELLING LAW OFFICES BENNETT BIGELOW & LEEDOM, P.S. PRODUCTION OF RECORDS - Page 3 601 Union Street, Suite 1500 02975-001\2578547\_3 Seattle, Washington 98101-1363

T: (206) 622-5511 F: (206) 622-8986